

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

MARISA PIZZARELLI, on behalf)	
of herself and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Civ. A. No. 1:15-cv-00254
)	
THE CADILLAC LOUNGE, L.L.C.,)	
d/b/a THE CADILLAC LOUNGE,)	
)	
Defendant.)	

JOINT STATUS REPORT AND MOTION TO EXTEND STAY

Plaintiff Marisa Pizzarelli, on behalf of herself and all others similarly situated, and Defendant The Cadillac Lounge, L.L.C. hereby submit this Joint Status Report and Motion to Extend Stay concerning payment of the gross settlement fund in this matter:

1. This case has been stayed since May 1, 2020, due to the impact of the COVID-19 pandemic on Defendant's business operations. As set forth in their prior joint motions and status reports, *see* docket nos. 62, 64, and 65, the COVID-19 pandemic has resulted in the closure of Defendant's business, the Cadillac Lounge. Without the revenue generated by that business, Defendant has been unable to finance the parties' class settlement, which the Court approved on February 25, 2020.

2. On March 4, 2021, the Court directed the Parties to submit a joint status report. Defendant's business – the Cadillac Lounge – reopened in February 2021 on a limited schedule at partial capacity after being closed for 11 months due to the limitations imposed by the COVID-19 pandemic and the City of Providence's restrictions on large gatherings and indoor business operations.

3. The parties respectfully request that the Court extend the current stay in this matter, including Defendant's deadline to make payment of the gross settlement fund, by an additional 90 days, and afford the parties the same amount of time to submit another status report. The additional time will allow Defendant to continue operations and assess its financial prognosis as governmental restrictions on businesses are gradually being lifted.

Accordingly, for the reasons set forth herein, the parties respectfully request that the Court grant this request and extend the current stay now in effect by a period of 90 days.

Respectfully submitted,
MARISA PIZZARELLI, on behalf of herself
and all others similarly situated,

By their attorneys,

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Respectfully submitted,
THE CADILLAC LOUNGE, L.L.C. d/b/a
THE CADILLAC LOUNGE,

By their attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that this document has been filed electronically and is available for viewing and downloading from the ECF system. I further certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 18, 2021.

/s/ Stephen J. Brouillard
Stephen J. Brouillard, Esq.